

April 30, 2013

District Dept. of the Environment
Attn: Brian Van Wye
Natural Resources Administration
1200 First Street, N.E. 5th Floor
Washington, D.C. 20002

RE: Comments on Updated Proposed Stormwater Rule

Contech would like to start by thanking you for the ongoing opportunity to provide feedback on the new stormwater rules being proposed for Washington D.C.. We are also pleased to see that the rule has evolved based on feedback received during the first round of public comment. We feel many of these changes have improved the proposed rule. At this time we have one remaining significant comment specific to the proposed rule that is included below.

The rule still does not clearly address whether treatment is required for untreated runoff leaving a site in instances when offsite retention is provided for as much as 50% of the SWRv. In other words, if only 50% of the SWRv is kept onsite we suggest that flow through treatment be provided for the remaining 50% of the SWRv that will be discharged from the site. Additionally, if it is not possible to retain 50% of the SWRv onsite we suggest clearly stating that treatment is required for 100% of the SWRv that is not contained onsite. We suggest adding language to section 520 in order to clarify treatment requirements.

Respectfully,

Derek M. Berg
Regulatory Manager- Stormwater

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